## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

CARLOS ZACARIAS, on behalf of himself and all others similarly situated,

Plaintiff,

v.

Civil Action

STG LOGISTICS, INC. a/k/a ST. GEORGE LOGISTICS, ZJR STAFFING, LLC a/k/a ZJR STAFFING S-CORPORATION, JOSE LUIS HUGO, an Individual, and ZULMA JANET ROSADO, an Individual,

Defendants.

Case No. 2:21-cv-13061-SRC-ESK

# NOTICE OF PLAINTIFF'S UNOPPOSED MOTION FOR FINAL APPROVAL OF COLLECTIVE AND CLASS SETTLEMENT AND RELATED RELIEF

For the reasons set forth in the accompanying Memorandum of Law and supporting Declaration of Mitchell Schley, with its enclosed exhibits, Plaintiff respectfully requests that the Court enter an Order:

- (1) granting final approval of the Parties' Stipulation of Settlement and Release (the "Stipulation" or "Settlement"), annexed as Exhibit 1 to the Declaration of Mitchell Schley, Esq.;
- (2) finding for settlement purposes only that the Class satisfies the applicable standards for certification under Rule 23 of the Federal Rules of Civil Procedure;
- (3) finding for settlement purposes only that the Settlement Class Members meet the requirements for collective action certification under Section 216(b) of the Fair Labor Standards Act;
  - (4) granting Class Counsel's request for attorney's fees of \$100,000;

- (5) granting Class Counsel's request for reimbursement of costs of \$3,207;
- (6) granting the Plaintiff's request for a service award of \$5,000 to him;
- (7) granting the Claims Administrator's request of \$12,625 for Settlement Administration Expenses for services it rendered and will render per the Stipulation;
- (8) adopting and incorporating by reference all other terms of the Stipulation as part of the Court's Order; and
  - (9) granting such other or further relief as the Court deems just and proper.
    For the Court's convenience, a revised Proposed Final Approval Order is enclosed in this Notice.

Dated: February 21, 2024

#### LAW OFFICES OF MITCHELL SCHLEY, LLC

By: /s/ Mitchell Schley
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Attorneys for Plaintiff

Enclosure (Proposed Order)

#### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the Notice of Plaintiff's Unopposed Motion for Final Approval of Collective and Class Settlement and Related Relief, Memorandum of Law in Support of the Plaintiff's Unopposed Motion for Final Approval of Collective and Class Settlement and Related Relief, Declaration of Mica Gantt, Claims Administrator, Declaration of Mitchell Schley, and [Proposed] Order Granting Plaintiff's Unopposed Motion for Final Approval of Collective and Class Action Settlement and Related Relief has been served on all Counsel of record by the Court's ECF System.

### LAW OFFICES OF MITCHELL SCHLEY, LLC

/s/ Mitchell Schley
Mitchell Schley, Esq.

Dated: February 21, 2024